

**REMARKS**

Favorable reconsideration of the application is respectfully requested in light of the amendments and remarks herein.

Claims 7-22 were pending in this application. By the present Amendment, Claims 7, 11, 15 and 19 are amended and Claims 23-26 are added.

Claims 7, 9-11, 13-15, 17-19 and 21-22 were rejected under 35 U.S.C. 102(e) over U.S. Patent No. 6,081,878 ("Estakhri"). Claims 7-22 were rejected under §103(a) over Estakhri in view of Evers, DOS and the FAT file system; and Claims 8, 12, 16 and 20 were alternatively rejected in further view of "the admitted Prior Art". Applicants submit that all claims in this application, at least in the form presented herein, are patentable over the cited references for at least the following reasons:

Considering independent Claim 7, for example, it is submitted that Estakhri does not disclose or suggest a nonvolatile memory system that includes a plurality N of nonvolatile storages within which at least one cluster of data is recorded, with each cluster constructed by a plurality K of sectors; address designating means for designating an address of the cluster in which data is recorded; recording means for recording data into a storage location at the address designated by said address designated means; wherein, said plurality of storages are divided into a plurality of segments; each said segment is distributed and arranged into said plurality of storages; and *each said segment is composed of a plurality of clusters, and a first N clusters of a given segment each having first to Kth entire sectors successively stored in first to Kth memory locations, respectively, of a corresponding one of said N storages, whereby the sectors of said N clusters are continuously arranged across said N storages.*

For the Examiner's convenience in understanding the claimed subject matter, an example of the present invention is illustrated in FIG. 5 of the application, in which entire sectors of a cluster are successively stored in rows of the same memory bank (storage); and a next cluster is completely stored in successive rows of the adjacent memory bank. In the example illustrated, sectors 0 to 15 of a first cluster are successively stored in Storage 0; sectors 16 to 31 of a second cluster are successively stored in Storage 1; and so on, to Storage 3 ( $N=4$ ,  $K=16$  in this example). It is understood that this example is illustrative and the present invention is by no means limited to the embodiments disclosed in the specification.

In contrast to Applicants' claims, Estakhri does not disclose or suggest a nonvolatile memory system where a first  $N$  clusters of a given segment each having first to  $K$ th entire sectors successively stored in first to  $K$ th memory locations, respectively, of a corresponding one of  $N$  storages, whereby the sectors of the  $N$  clusters are continuously arranged across the  $N$  storages. Rather, Estakhri splits up each sector of data into halves, with a first half (44) stored in a first memory bank (18) and the second half (46) stored in a corresponding location in the second memory bank (20). Thus, the memory bank (18), for example, stores only half a sector of data, not an entire sector. Hence Estakhri's sector splitting technique is different from the continuous sector arrangement across  $N$  storages as claimed in Applicants' claims.

Accordingly, in light of the above differences, Estakhri does not anticipate Claim 7. Note that none of DOS, the FAT system or the Evers patent cited in the Office Action cures the deficiencies of Estakhri with respect to Applicants' claims; and thus any proper combination of these with Estakhri would not render the present invention obvious under §103.

For analogous reasons, Applicants' inventions as set forth in independent Claims 11, 15 and 19 are not anticipated or render obvious by Estakhri.

The remaining claims in this application are patentable based at least upon their respective dependencies from one of the above-noted independent claims.

In addition, by way of example, new claims 23-26 each recite that N is at least three. Thus, there are at least three nonvolatile storages, and a first three or more clusters of a given segment are continuously arranged across the three or more storages. In contrast to these claims, Estakhri only discloses distributing sector data across two memory banks (see, e.g., Fig. 6a, FLASH0 and FLASH 1). Accordingly, claims 23-26 are further distinguishable from the cited references.

#### Conclusion

In light of the foregoing, entry of this Amendment, and the allowance of this application with Claims 7-26 are respectfully solicited.

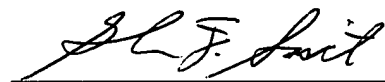
The above statements concerning the disclosures in the cited references represent the present opinion of Applicant's representative and, in the event that the Examiner disagrees, Applicant's representative respectfully requests the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

It is submitted that the claims in this application, as originally presented, are patentably distinct over the prior art cited by the examiner, and that these claims were in full compliance with the requirements of 35 U.S.C. 112. Replacement of these claims, as presented herein, is not done for the purpose of patentability within the meaning of 35 U.S.C. §§101, 102, 103 or 112. Rather, these changes are made for clarification and to round out the scope of protection for the invention.

In the event that additional cooperation in this case may be helpful to complete its prosecution, the Examiner is cordially invited to contact Applicant's representative at the telephone number written below.

Respectfully submitted,  
FROMMER LAWRENCE & HAUG LLP

By:



Glenn F. Savit  
Reg. No. 37,437  
(212) 588-0800